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March 1, 2012

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby – TW-A325
Washington, D.C. 20554

**Re: AT&T Annual CPNI Compliance Certifications Calendar Year 2011
EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), AT&T, on behalf of the attached list of operating entities, hereby submits its annual CPNI compliance certifications for calendar year 2011 via the Commission's Electronic Comment Filing System.

Should you have any questions, feel free to contact me.

Sincerely,

/s/ Anisa A. Latif
Anisa A. Latif

Attachments

AT&T Inc. CPNI Certification
Calendar Year 2011

Date: 02-08-2012

1. I, Gerry R. Chicoine, SVP-Audit Services and Chief Compliance Officer, AT&T Services, Inc., Finance-Audit Services and Compliance, hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: G.R. Chicoine

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2011
OF Gerry R. Chicoine, SVP-Audit Services and Chief Compliance Officer, AT&T
Services, Inc., Finance-Audit Services and Compliance**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Finance-Asset Protection organization of AT&T Services, Inc., (my organization) ensure compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

A. CPNI Investigations. Asset Protection personnel investigate CPNI security breach allegations and have the responsibility for reporting all confirmed CPNI security breaches to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) electronically through a central reporting facility as the FCC requires.

B. Overseeing Processes. My organization designated a CPNI Subject Matter Expert (SME) responsible for ongoing training of Asset Protection personnel on CPNI breach allegation receipt, investigation, reporting, and recordkeeping. The SME reviews all CPNI investigations for compliance with FCC rules, ensuring all customer CPNI

complaints are logged in AT&T's CPNI Data Repository, the customer and the USSS/FBI are notified of the breach in the time frames specified, and the cases are documented correctly in Asset Protection's case management system. The SME routinely provides CPNI Process and Procedures training to Asset Protection personnel.

C. Reporting Confirmed CPNI Breaches. My organization has established Methods and Procedures (M&Ps) to manage reporting confirmed CPNI security breaches to the USSS/FBI within the specified time frame electronically through a central reporting facility. These M&Ps are routinely reviewed to ensure compliance. See 47 C.F.R. §64.2011 (a), (b) (1)-(3).

D. Notification to Customers. My organization has established M&Ps for notifying customers of a confirmed CPNI security breach. A confirmed breach report containing customer information necessary to notify customers of their confirmed breach is compiled. The information is provided to the proper business unit responsible for notifying customers. Follow-up with the business unit is completed to ensure customers are notified of the CPNI breach. This documentation is retained for a minimum of two years. These M&Ps are reviewed with Asset Protection personnel routinely to ensure compliance. See 47 C.F.R. §64.2011 (c).

E. Recordkeeping. My organization has developed M&Ps to maintain records of discovered breaches and notifications made to the USSS/FBI. The records include, if available, dates of discovery and notification, a detailed description of the CPNI that was the breach subject, and the breach circumstances. These records are retained for a minimum of two years. See 47 C.F.R. §64.2011 (d).

**AT&T Inc. CPNI Certification
Calendar Year 2011**

Date: 2/14/2012

1. I, David Christopher, Chief Marketing Officer of Mobility and Consumer Markets hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: _____

A handwritten signature in black ink, appearing to read "D. Christopher", is written over a horizontal line.

EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2011:
DAVID CHRISTOPHER, CHIEF MARKETING OFFICER—AT&T MOBILITY AND CONSUMER MARKETS

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Mobility and Consumer Markets Organization (“My Organization”) ensure compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC’s rules. This statement summarizes the procedures and explains how they were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations, in which case My Organization operates in compliance with them. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

A. Customer CPNI Approvals. To the extent applicable, My Organization has:

- 1.** Established processes and controls preventing the use of, disclosure of, or access to CPNI to market out of category services without customer approval or unless such use, disclosure, or access is permitted under FCC rules. Those processes and controls include the review of list pulls and outbound marketing campaigns to ensure that CPNI rules are followed before the campaigns are launched. Further, the personnel who review the list pulls and outbound marketing campaigns are trained that any approval or disapproval by a customer of the use, disclosure, or access to the customer’s CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. § 64.2005(a) and (b) and § 64.2007(a)(2). Specifically, these processes and controls ensure that no use, disclosure, or access to a customer’s individually identifiable CPNI occurs except where: (1) the customer granted “opt in approval” as defined in 47 C.F.R. § 64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. § 2005; or (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. § 64.2007(b).

2. Established processes and controls whereby, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, the customer is notified of the customer's right to restrict use, disclosure, and access to CPNI. See 47 C.F.R. § 64.2008(a)(1). These processes and controls include the review and approval of any change in content or distribution method for initial CPNI Rights Notifications and Biennial CPNI Rights Notifications. Further, specific job functions have been established within My Organization to manage CPNI, including the development of new processes to comply with any CPNI rule modifications by the FCC. See 47 C.F.R. § 64.2008(a)-(d).

3. Established processes and controls to ensure that toll-free numbers with IVR and voice mail features permitting customers to "opt out" are available 24 hours a day, seven days a week. Those processes and controls include test calls to the toll-free numbers several times a week and robust reporting of opt-out activity that is reviewed on a daily and weekly basis. See 47 C.F.R. § 64.2008(d)(3)(v).

4. Established processes and controls to ensure AT&T agents comply with the FCC's CPNI rules. These processes and controls include an annual notice sent to vendor agents involved in marketing and/or fulfillment of CPNI Rights Notifications and Biennial CPNI Rights Notifications reminding them of their obligations to ensure the confidentiality and proper use of all such information. See 47 C.F.R. § 64.2007(b).

B. Training and Discipline: My Organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, My Organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods, such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner, and all AT&T employees are required to review the Code of Business Conduct, which contains information on CPNI compliance, on an annual basis. See 47 C.F.R. § 64.2009(b).

2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action, up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. § 64.2009(b).

C. Sales and Marketing Campaigns. My Organization:

1. Maintains a record, for at least one year, of all approved marketing campaigns, including a description of the campaign, the type of CPNI used, and the products and services offered. See 47 C.F.R. § 64.2009(c).
2. Has established a supervisory review process for all outbound marketing campaigns to ensure all sales and marketing campaigns that propose to use CPNI are reviewed and approved. All proposed outbound marketing campaigns, requests for use of CPNI, and requests for marketing lists and customer data are submitted for review and require supervisory approval by the Database Marketing group. See 47 C.F.R. § 64.2009(d).

D. Security and Authentication. My Organization has:

1. Established processes and controls to notify the customer when a password, back-up means of authentication for lost or forgotten passwords, an online account, or an address of record is created or changed and to ensure that the content and delivery of such notice is in accordance with 47 C.F.R. § 64.2010(f). See also 47 C.F.R. § 64.2003(b). Specifically, My Organization reacts to triggers from IT systems that notification must be sent. My Organization manages the content and delivery of such notifications and validates by reviewing customer counts, notification types, distribution method and distribution reports from internal and external vendors.
2. Established processes and controls to ensure that customer-initiated CPNI complaints or breaches, as "breach" is defined in 47 C.F.R. § 64.2011(e), are reported to AT&T Asset Protection for investigation and resolution and for complaint tracking and breach reporting purposes. See 47 C.F.R. § 64.2011. My Organization also, at the

AT&T Inc. CPNI Certification
Calendar Year 2011

Date: _____

1/30/12

1. I, Andrew Geisse, Executive Vice President of Global Customer Service, hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: _____



**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2011
OF Andrew Geisse, Executive Vice President of Global Customer Service**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the ABS Global Customer Service (my organization) ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

A. Customer CPNI Approvals. To the extent applicable my organization has:

1. Established and distributed methods and procedures (M&Ps) whereby personnel were not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).
2. Established and distributed M&Ps whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).
3. Established and distributed M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).
4. Established and distributed M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established and distributed M&Ps whereby personnel were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).
5. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. 47 C.F.R. §64.2008(b) and (c).

6. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer's CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).

B. Training and Discipline: My organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, my organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).
2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: To the extent applicable my organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

D. Security and Authentication. To the extent applicable my organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. §64.2010(a).

2. Established methods and procedures prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. § 64.2010(e)
3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c) and (e).
4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010 (f).

**AT&T Inc. CPNI Certification
Calendar Year 2011**

Date: February 23, 2012

1. I, Denise Iverson, Director of Operations, BellSouth Long Distance, LLC d/b/a AT&T Long Distance, hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.



Signature: _____

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2011 OF
Denise Iverson, Director of Operations, BellSouth Long Distance, LLC d/b/a AT&T Long
Distance**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the BellSouth Long Distance, LLC d/b/a AT&T Long Distance Customer Resource Center ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

A. Customer CPNI Approvals.

1. The CRC is responsible for billing inquiry and limited order submission for Business customers. The CRC is not a sales channel and therefore employees do not engage in any customer marketing or solicitation of Business products or services. 47 C.F.R. §64.2008(b)

B. Training and Discipline: My organization:

1. Requires all personnel who have access to customer data to complete specific CPNI training. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).

2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any

failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: To the extent applicable my organization has apprised relevant personnel that: (a) they are required to refer any customer complaint regarding unauthorized access to disclosure or release of CPNI to a Business Unit Manager. See 47 C.F.R. §64.2009 (e).

D. Security and Authentication. To the extent applicable my organization has:

1. Apprised relevant personnel that they may only disclose call detail information by sending it to the customer's address of record. See C.F.R. § 64.2010(b).

2. Established account access policies outlining the information required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access.¹ Apprised relevant personal that they must confirm in writing, to the customer's address of record, any request to change email address or customer contact information. This written confirmation must contain a specific ticket number. The customer must contact the carrier to validate the email change request and refer to the ticket number. Apprised relevant personnel that they may only forward CPNI to a validated email address that has been on file for more than 30 days and may not include call detail information.

¹ During process reviews in early 2012, a deficiency was noted in CPNI safeguards at one call center. Action was immediately taken to correct the deficiency. There is no evidence that CPNI was ever disclosed to improper parties due to this deficiency.

AT&T Inc. CPNI Certification
Calendar Year 2011

Date: 2/15/12

1. I, Frank Jules, Executive Vice President-Global Enterprise Solutions ("Responsible Business Unit") hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: Frank Jules

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2011
OF Frank Jules, Executive Vice President-Global Enterprise Solutions**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by Global Enterprise Solutions (my organization) ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

A. Customer CPNI Approvals. To the extent applicable my organization:

1. Follow established and distributed methods and procedures (M&Ps) whereby personnel were not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).
2. Follow established and distributed M&Ps whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).

3. Follow established and distributed M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).
4. Follow established and distributed M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established and distributed M&Ps whereby personnel were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).
5. Follow established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. 47 C.F.R. §64.2008(b) and (c).
6. Follow established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer's CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).
7. Follow established M&Ps or implemented systems to clearly establish the status of a customer's CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).

B. Training and Discipline: My organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, my organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).
2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly,

any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: To the extent applicable my organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

D. Security and Authentication. To the extent applicable my organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).
2. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c) and (e).
3. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010 (f).

**AT&T Inc. CPNI Certification
Calendar Year 2011**

Date: 2/16/12

1. I, Mark Keiffer, President – Customer Solution Centers, AT&T Services, Inc., hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Responsible Business Unit for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: Mark Keiffer

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2011
OF MARK KEIFFER, President – Customer Solution Centers, AT&T Services, Inc.**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the AT&T Customer Solution Centers (my organization) ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

A. Customer CPNI Approvals. To the extent applicable my organization has:

1. Established and distributed methods and procedures (M&Ps) whereby AT&T employees, agents and representatives were not to disclose or permit access to customer's CPNI for out of category services without customer approval or unless such disclosure or access was permitted under FCC rules and AT&T employees, agents and representatives were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).
2. Established and distributed M&Ps whereby AT&T employees, agents and representatives were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).

3. Established and distributed M&Ps whereby AT&T employees, agents and representatives were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).

4. Established and distributed M&Ps whereby AT&T employees, agents and representatives for the inbound consumer call centers and outbound telemarketing groups were required, prior to any oral solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of: 1) the customer's right to restrict use, disclosure and access to CPNI; 2) the types of information that constitute CPNI; 3) the purpose for which the CPNI would be used; 4) the specific entity that would be using the CPNI; 5) the customer's right to deny or withdraw access to their CPNI at any time; and 6) that denial of approval to use the customer's CPNI will not affect the provision of any service to which that customer subscribes. See 47 C.F.R. §64.2008(a)(1) and 47 C.F.R. §64.2008(f)(1).

5. Established and distributed M&Ps whereby AT&T Employees, agents and representatives were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a) See 47 C.F.R. §64.2008(a)(2).

6. Established and distributed M&Ps whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. The desktop tools used by AT&T employees, and the M&Ps contain verbiage and detailed scripting requirements setting for the required notifications detailed in 47 CFR §64.2008(c) and do not contain any statements prohibited by 47 C.F.R. §64.2008(c). See 47 C.F.R. §64.2008(b) and (c).

7. Maintained an IVR and toll free number with voice mail whereby customers, at no additional cost, could avail themselves of an "opt-out" method. The IVR and voice mail were available 24 hours a day, seven days a week. See 47 C.F.R. §64.2008(d)(3)(v).

8. By complying with the requirements of 47 C.F.R. §64.2008(a), (b) and (c), AT&T has complied with the requirements of 47 C.F.R. §64.2008(e) as to oral notifications. See 47 C.F.R. §64.2008(e).

9. Established and distributed M&Ps or scripts whereby AT&T employees, agents and representatives were required, prior to any oral solicitation for limited, one time use of a customer's CPNI for duration of the call, to provide the customer with the required notifications

as set forth in 47 C.F.R. §64.2008(c) and not to include any statements prohibited by the aforementioned regulation. See 47 C.F.R. §64.2008(f).

10. Established and distributed M&Ps and implemented desktop tools whereby AT&T employees, agents and representatives could clearly establish the status of a customer's CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).

B. Training and Discipline: My organization:

1. Requires all personnel who have access to customer data or who make outbound marketing calls to complete specific CPNI training. In addition, my organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).

2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: My organization has established and distributed M&Ps whereby AT&T employees, agents and representatives are: (a) required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

D. Security and Authentication. My organization has:

1. Established and distributed M&Ps whereby AT&T employees, agents and representatives are required to authenticate a customer prior to disclosing CPNI on customer-initiated telephone contacts. See C.F.R. § 64.2010(a).

2. Established and distributed M&Ps whereby AT&T employees, agents and representatives are prohibited from discussing customer call detail information over the

telephone unless the customer provides the call detail to be discussed. Duplicate bills containing call detail information can be mailed to the customer's address of record that is at least thirty days old. See 47 C.F.R. § 64.2010(e)

4. Established and distributed M&Ps whereby AT&T employees, agents and representatives were apprised that: 1) to establish a password on the account, the customer must be authenticated without the use of readily available biographical or account information; 2) that if a customer loses or forgets their password, the customer may not be authenticated using any readily available biographical information. See 47 C.F.R. §64.2010(e).

5. Established and distributed M&Ps whereby AT&T customers are to be notified immediately whenever a password, customer response to a back up means of authentication for lost or forgotten passwords, an online account or an address of record is changed or created. See 47 C.F.R. §64.2010 (f).

6. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. §64.2010(c) and (e).

7. Where appropriate, desktop tools for the AT&T employees, agents and representatives were created and maintained to support the M&Ps identified herein.

**AT&T Inc. CPNI Certification
Calendar Year 2011**

Date: 13 February 2012

1. I, Glenn Lurie, President – Emerging Devices, Resale and Partnerships, AT&T Mobility & Consumer (“Responsible Business Unit”), hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC’s rules, 47 C.F.R. § 64.2001 et. seq. (the “FCC’s CPNI rules”).

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: _____

A handwritten signature in dark ink, appearing to read 'Glenn Lurie', is written over a horizontal line. The signature is stylized with a large 'G' and a long, sweeping underline.

AT&T Mobility and Consumer Markets – Emerging Devices, Resellers and Partnerships

EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2011 OF GLENN LURIE, PRESIDENT – EMERGING DEVICES, RESALE, AND PARTNERSHIPS

In accordance with Section 64.2009(e) of the Federal Communications Commission's ("FCC") CPNI rules, AT&T Mobility and Consumer Markets Emerging Devices, Resellers, and Partnerships ("My Organization") has adopted procedures that are adequate to ensure compliance with 47 C.F.R. Part 64 Subpart U-Customer Proprietary Network Information. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations, in which case My Organization operates in compliance with such applicable processes and procedures. To the extent My Organization discovers or is made aware of an error, we investigate the cause of the error, fix the error, and, if necessary, update our methods and procedures and provide additional training to prevent a reoccurrence.

A. Customer CPNI Approvals. My Organization:

1. As a matter of day to day operation does not directly disclose or access customer's CPNI for out of category services.
2. Manages a total of four (4) third parties who have access to customer CPNI. Those third parties are:
 - a) Apple Inc. ("Apple");
 - b) Asurion Warranty Protection Services, LLC ("Asurion");
 - c) Sutherland Global Services Inc. ("Sutherland"); and
 - d) PlumChoice, Inc. ("PlumChoice").
3. Apple sales personnel have access to CPNI because Apple sells AT&T wireless services plans. Apple is contractually committed to and has implemented a training program that instructs Apple's sales personnel who sell iPhones and AT&T service plans on the proper

use of CPNI, including the requirement that they obtain consent from customers prior to using CPNI to sell anything other than AT&T wireless services.

4. Certain Asurion, Sutherland, and PlumChoice employees have access to CPNI, primarily for purposes of verifying a customer's eligibility to receive the services offered by those companies on behalf of AT&T. Asurion, Sutherland, and PlumChoice are contractually committed to and have each implemented a training program that instructs their employees who have access to CPNI on the proper use of CPNI, including the requirement that CPNI only be used in compliance with all applicable laws.

B. Training and Discipline.

1. My Organization requires all employees to review and certify to AT&T's Code of Business conduct which includes general information regarding protection of customer records and system access policies. New employees are required to complete this training within 30 days of their start date. AT&T further requires all employees who have access to customer data to complete specific CPNI training and provides relevant employees information on CPNI and other privacy related issues through less formal education methods such as employee communications. See 47 C.F.R. §64.2009 (b).

2. AT&T maintains a policy requiring compliance with CPNI rules and advises in the CPNI training and in the Code of Business Conduct that any failure by any personnel to comply with the CPNI rules is subject to disciplinary action up to and including termination of employment, depending of the nature and severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches. To the extent applicable My Organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

AT&T Inc. CPNI Certification
Calendar Year 2011

Date: Feb 10, 2012

1. I, Cathy Martine-Dolecki, EVP Small Business Solutions and Alternate Channels ("Responsible Business Unit") hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: Cathy Martine Dolecki

EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2011 OF Cathy Martine-Dolecki, Executive Vice President Small Business Solutions and Alternate Channels

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Small Business Solutions and Alternate Channels (my organization) ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

A. Customer CPNI Approvals. To the extent applicable my organization:

1. Follow established and distributed methods and procedures (M&Ps) whereby personnel were not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).

2. Follow established and distributed M&Ps whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).
3. Follow established and distributed M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).
4. Follow established and distributed M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established and distributed M&Ps whereby personnel were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).
5. Follow established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. 47 C.F.R. §64.2008(b) and (c).
6. Follow established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer's CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).
7. Follow established M&Ps or implemented systems to clearly establish the status of a customer's CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).

B. Training and Discipline: My organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, my organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).

2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: To the extent applicable my organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

D. Security and Authentication. To the extent applicable my organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).

2. Established methods and procedures prohibit the disclosure of call detail over the phone in a manner consistent with 47 C.F.R. § 64.2010(e)

3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c) and (e).

4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010 (f).

AT&T Inc. CPNI Certification
Calendar Year 2011

Date: 2/7/12

1. I, Kathryn Morrissey, Executive Vice President, Wholesale and GEM Solutions hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: Kathryn Morrissey

EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2011
OF Kathryn Morrissey, Executive Vice President, Wholesale and GEM Solutions

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Wholesale and GEM Solutions Organization (WGS) that ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent that AT&T discovers or is made aware of an error, My Organization investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

A.. Customer CPNI Approvals. To the extent applicable my organization has or my support organization has:

1. Established procedures whereby personnel were not to disclose or permit access to customer's CPNI for out of category services without customer approval or unless such disclosure or access was permitted under FCC rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).
2. Established procedures whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).
3. Established procedures whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).

4. Established procedures whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established procedures whereby personnel were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).
5. Maintained an IVR and toll free number with voice mail whereby customers, at no additional cost, could avail themselves of an "opt-out" method. The IVR and voice mail were available 24 hours a day, seven days a week. See 47 C.F.R. §64.2008(d)(3)(v).
6. Established procedures whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer's CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).
7. Use established systems to clearly maintain the status of a customer's CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).

B. Training and Discipline: My organization:

1. Requires all personnel within my organization who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).
2. WGS maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: To the extent applicable my organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

D. Security and Authentication. I have knowledge that the respective Care teams which support my organization have:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access.

See C.F.R. § 64.2010(a).

2. Established methods and procedures prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. § 64.2010(e)

3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c) and (e).

4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by C.F.R. §64.2010 (f)

AT&T Inc. CPNI Certification
Calendar Year 2011

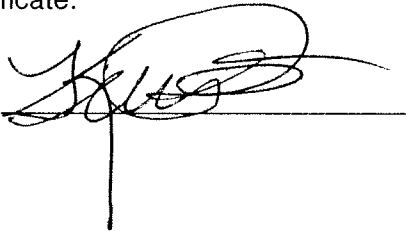
Date: February 24, 2012

1. I, Kevin Peters, Chief Marketing Officer, AT&T Business Solutions – Business Marketing (“Responsible Business Unit”), hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Business Marketing Organization for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC’s rules, 47 C.F.R. § 64.2001 et. seq. (the “FCC’s CPNI rules”).

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: _____

A handwritten signature in black ink, appearing to read "Kevin Peters", is written over a horizontal line. A vertical line extends downwards from the center of the signature.

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2011
OF KEVIN PETERS, CHIEF MARKETING OFFICER, AT&T BUSINESS SOLUTIONS –
BUSINESS MARKETING**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the AT&T Business Marketing Organization (my organization) ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

1. AT&T Business Marketing has processes in place to protect the access to Customer Proprietary Network Information as defined in 47 C.F.R. § 64.2001 et seq.
2. AT&T Business Marketing has processes and procedures in place designed to obtain customer approval to use, disclose or permit access to CPNI if AT&T intends to use CPNI in circumstances where such approval would be required. As part of the CPNI solicitation process, AT&T advises customers of their right to restrict use of, disclosure of, and access to CPNI, and provides the customer the requisite notice information required by 47 C.F.R. § 64.2005 and 64.2008.
3. AT&T Business Marketing has established methods and procedures designed to implement customer notifications to comply with the FCC rules to include storage


and archiving of notifications for a minimum of one year required by 47 C.F.R. § 64.2008.

4. AT&T Business Marketing has provided adequate training to employees on when they are and are not authorized to use CPNI. AT&T has established a strict Privacy Policy that explains CPNI in detail, and employees adhere to the AT&T Code of Conduct which describes employees' obligation to protect customer information. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. See 47 C.F.R. §64.2009.
5. AT&T Business Marketing has supervisory review processes in place to reasonably ensure compliance with its personnel obtaining supervisory approval of any proposed outbound marketing request for customer approval, and for the maintenance of records related to carrier compliance. See 47 C.F.R. § 64.2009 (d).
6. To the extent applicable, relevant personnel in my organization are aware that:
 - (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system;
 - and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

**AT&T Inc. CPNI Certification
Calendar Year 2011**

Date: 11 January 2012

1. I, Paul Roth, President-Retail Sales & Service, AT&T Mobility & Consumer ("Responsible Business Unit"), hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 

AT&T MOBILITY AND CONSUMER MARKETS – Retail Sales and Service EXPLANATORY STATEMENT OF CPNI COMPLIANCE 2011

In accordance with Section 64.2009(e) of the Federal Communication Commission's ("FCC") CPNI rules, AT&T Mobility and Consumer Markets – Retail Sales and Service ["My Organization"], has adopted procedures that are intended to ensure compliance with 47 C.F.R. Part 64 Subpart U-Customer Proprietary Network Information. This statement summarizes and explains these procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations, in which case My Organization operates in compliance with such applicable processes and procedures. My Organization's processes also include processes designed to detect and correct potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent My Organization discovers or is made aware of an error, we investigate the error, execute actions designed to fix the error, and, if necessary, update our methods and procedures and provide additional training to prevent a reoccurrence.

A. Customer CPNI Approvals. My Organization has:

1. Established processes and controls intended to prohibit the use of, disclosure of, or access to CPNI to market service offerings that are not within a category of service to which the customer already subscribes from AT&T or its affiliates ("out-of-category services") or any other purpose requiring customer approval, unless: (a) such access, use, or disclosure is permitted under the FCC's rules without customer approval. See 47 C.F.R. § 64.2005; or (b) the customer granted limited, one-time use "opt-in approval" as defined in 47 C.F.R. § 64.2003(k) for the duration of a call or the duration of a visit. See 47 C.F.R. § 64.2007(b) and 47 C.F.R. § 64.2008(f).
2. Established processes and controls to maintain a record, for at least one year, of limited, one-time use approval to use a customer's CPNI to market "out-of-category" services for the duration of a call or the duration of a visit. See 47 C.F.R. § 64.2007(a)(3).

3. Established processes and controls requiring oral notification of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI consistent with 47 C.F.R. § 64.2008(a)(1) and to provide the customer the requisite notice information required by 47 C.F.R. § 64.2008(c) prior to any solicitation for limited, one-time use approval to use CPNI to market "out of category" services. See 47 C.F.R. § 64.2008(f).
4. My organization has reinforced the requirement AT&T imposes on agents that sell AT&T services to include CPNI disclosures in their order flow, and we will implement information systems improvements in February 2012 that will provide greater assurance that the appropriate disclosures will always appear in dealer order flows.

B. Training and Disciplinary Policy.

1. My Organization requires all employees to review and certify to AT&T's Code of Business conduct which includes general information regarding protection of customer records and system access policies. New employees are required to complete this training within 30 days of their start date. AT&T further requires all employees who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training and provides relevant employees information on CPNI and other privacy related issues through less formal education methods such as employee communications. See 47 C.F.R. § 64.2009(b).
2. AT&T maintains a policy requiring compliance with the CPNI rules and advises in the CPNI training and in the Code of Business Conduct that any failure by any personnel to comply with the CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the nature and severity of the non-compliance. See 47 C.F.R. § 64.2009(b).
3. My organization has reinforced the mandatory training we require of AT&T dealer representatives. We have sent training announcement letters to all Dealer principals and our management personnel responsible for dealer management provide the dealers with training completion reports. In addition, the store visit checklist for dealers now includes training completion items.

C. Sales and Marketing Campaigns. All Sales and Marketing Campaigns in which My Organization engages are governed by processes and procedures whereby such activities are reviewed and receive the requisite supervisory approval and in connection with which the requisite records are maintained for a one year period.

D. Security and Authentication. My Organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).
2. Established methods and procedures prohibiting the disclosure of call detail over the phone.
3. Established a policy that prohibits access to or disclosure of CPNI except to customers and authorized users who first provide a valid photo ID matching their name on the account. See 47 C.F.R. § 64.2010(d).
4. Established processes and controls to authenticate a customer or authorized user without the use of readily available biographical information or account information in order to establish a password that grants access to CPNI. See 47 CFR 64.2010(e).
5. Employed AT&T's established processes and controls to log and process customer-initiated CPNI complaints and breaches (as "breach" is defined in 47 CFR 64.2011(e)) for investigation and resolution and for complaint tracking and breach reporting purposes. See 47 CFR § 64.2011

AT&T Inc. CPNI Certification

Calendar Year 2011

Date: 1/30/2012

1. I, Michael J Viola, Senior Vice President – Finance ("Responsible Business Unit") hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 

2011 EXPLANATORY STATEMENT OF CPNI COMPLIANCE
of Michael J Viola, Senior Vice President – Finance

In accordance with the requirements of 47 C.F.R. §64.2009(e) of the FCC rules regarding CPNI, AT&T provides the following explanation of how its operating procedures are adequate to ensure compliance with the CPNI rules for the AT&T Finance, Credit & Collections and Global Fraud Management organizations. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence:

1. The Credit & Collections organization has established methods and procedures to ensure compliance with the rules around approval for the use, disclosure or access to CPNI and required notification for marketing to customers to the extent personnel in my organization makes sales referrals on inbound calls and for which the sales transaction is completed by other work groups.
(§64.2005(a), (b), §64.2007(a), §64.2008(a),(f))
2. To the extent Credit & Collections and Global Fraud Management personnel market to customers on inbound calls, adequate training for the associated methods and procedures has been provided to such personnel to ensure an understanding of when they are and are not authorized to use CPNI as well as the status of a customer's CPNI approval prior to the use of CPNI for marketing purposes. (§64.2009(a), (b))
3. AT&T has established policies that explain the requirements for protecting CPNI. Employees in my organization are required to adhere to the policies as well as the AT&T Code of Business Conduct. The Code of Business Conduct describes employees' obligation to protect customer information. There are also departmental standards and practices for ensuring compliance up to and including disciplinary actions against employees who do not adhere to CPNI rules.
4. For personnel in Credit & Collections and Global Fraud Management with access to CPNI, methods and procedures are in place to ensure adequate safeguards for the disclosure of CPNI. Procedures include specific authentication requirements prior to disclosing CPNI, including the use of passwords and back up authentication methods for lost or forgotten passwords as applicable. Additionally, procedures are in place to provide the required notifications for account changes as required by the rules. (§64.2010 (a), (b), (e), (f))
5. Methods and procedures are in place to support the requirements for tracking customer complaints regarding the unauthorized release of CPNI. The methods are reviewed semi-annually for completeness and communications are sent to all employees to increase awareness. Additionally, there is company wide training for social engineering that may lead to unauthorized release of CPNI information. (§64.2009 (e), §64.2011(a))

ATTACHMENT A
AT&T CY11 Annual CPNI Certifications

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
Acadiana Cellular General Partnership	0001837814
ACC Corp.	0014553119
ACC National Telecom Corp	0013443718
Alascom, Inc.	0001572676
AT&T Communications of California, Inc.	0003301702
AT&T Communications of Delaware, LLC.	0012838504
AT&T Communications of Hawaii, Inc.	0014532501
AT&T Communications of Illinois, Inc.	0003301793
AT&T Communications of Indiana, GP	0012838421
AT&T Communications of Maryland, LLC	0012838512
AT&T Communications of Michigan, Inc.	0003301876
AT&T Communications of Nevada, Inc.	0003301959
AT&T Communications of New York, Inc.	0012838462
AT&T Communications of NJ, LP	0012838520
AT&T Communications of Ohio, Inc.	0003301736
AT&T Communications of Pennsylvania, LLC	0012838538
AT&T Communications of Texas, Inc.	0016657918
AT&T Communications of the Midwest, Inc.	0003301751
AT&T Communications of the Mountain States, Inc.	0003301892
AT&T Communications of the Pacific Northwest, Inc.	0003301710
AT&T Communications of the South Central States, LLC	0012838561
AT&T Communications of the Southern States, LLC	0012838553
AT&T Communications of the Southwest, Inc.	0003301918
AT&T Communications of Virginia, LLC	0012838546
AT&T Communications of Washington, D.C., LLC	0012838488
AT&T Communications of West Virginia, Inc.	0003301785
AT&T Communications of Wisconsin, LP	0012838454
AT&T Corp	0005937974
AT&T Mobility II LLC	0016982233
AT&T Mobility LLC	0004979233
AT&T Mobility of Galveston LLC	0016658122
AT&T Mobility of Puerto Rico Inc.	0003473709
AT&T Mobility Spectrum LLC	0014980726
AT&T Mobility Wireless Operations Holdings Inc.	0020078887
AT&T of Puerto Rico, Inc.	0001731462
AT&T of the Virgin Islands, Inc.	0003464344
AT&T Services, Inc.	0008644056
AWACS, Inc.	0010852523
BellSouth International, LLC	0005858907
BellSouth Long Distance d/b/a AT&T Long Distance	0003733318
BellSouth Mobile Data, Inc.	0013935085

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
BellSouth Telecommunications, LLC	0020882668
BizTel, Inc.	0003998978
CCPR of the Virgin Islands, Inc. (AT&T Mobility USVI, Inc.)	0004499034
Centennial Communications Corp.	0009631136
Chattanooga MSA Limited Partnership	0001842723
Cincinnati SMSA Limited Partnership	0004160842
Cingular Wireless of Texas RSA #11 Limited Partnership	0003294048
Cingular Wireless of Texas RSA #16 Limited Partnership	0003294006
Cook Inlet GSM IV PCS Holdings, LLC	0006746523
Cook Inlet/VS GSM VII PCS, LLC	0012214029
Decatur RSA Limited Partnership	0004588455
Elkhart Cellular Telephone Company	0012927109
Florida RSA No. 2B (Indian River) Limited Partnership	0001837566
Georgia RSA No. 3 Limited Partnership	0001836998
Houma-Thibodaux Cellular Partnership	0004547931
Illinois Bell Telephone Company	0002860856
Indiana Bell Telephone Company, Inc.	0002904654
Iowa Wireless Services Holdings Corporation	0002576874
Lafayette MSA Limited Partnership	0001682509
Louisiana RSA No. 7 Cellular General Partnership	0001837798
Louisiana RSA No. 8 Limited Partnership	0001837830
Lubbock SMSA Limited Partnership	0001650787
Madison SMSA Limited Partnership	0002842060
McAllen-Edinburg-Mission SMSA Limited Partnership	0001658467
Michigan Bell Telephone Company	0002776771
Milwaukee SMSA Limited Partnership	0002846293
Missouri RSA 11/12 Limited Partnership	0001658418
Missouri RSA 8 Limited Partnership	0001658442
Missouri RSA 9B1 Limited Partnership	0001658426
Nevada Bell Telephone Company	0001552173
New Cingular Wireless PCS, LLC	0003291192
New Las Cruces Cellular Telephone Company, LLC	0003299963
Northeastern Georgia RSA Limited Partnership	0001837152
Oklahoma City SMSA Limited Partnership	0001658392
Oklahoma Independent RSA 7 Partnership	0010698884
Oklahoma RSA 3 Limited Partnership	0001658376
Oklahoma RSA 9 Limited Partnership	0001658368
Orlando SMSA Limited Partnership	0001843036
Pacific Bell Telephone Company	0001551530
PowerTel Memphis Licenses, Inc.	0001832807
PowerTel/Memphis, Inc.	0004336277
Redwood Wireless Corp	0002623601
Santa Barbara Cellular Systems Ltd.	0004312898
SBC Internet Services, Inc. d/b/a AT&T Internet Services	0012536033

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
SBC Long Distance, LLC	0003763497
SNET America, Inc.	0003737707
SNET Diversified Group, Inc.	0007586423
Southwestern Bell Telephone Company	0016627473
Suncom Wireless License Company, LLC	0003246055
Suncom Wireless, Inc.	0003246642
TC Systems, Inc.	0012833513
TCG America, Inc.	0003476611
TCG Chicago	0014531990
TCG Colorado	0014532022
TCG Connecticut	0014532048
TCG Dallas	0014532089
TCG Detroit	0014532113
TCG Illinois	0014532162
TCG Indianapolis	0014532204
TCG Joint Venture Holdings Inc. dba TCG Oregon	0014532238
TCG Kansas City, Inc.	0014532261
TCG Los Angeles, Inc.	0014532287
TCG Maryland	0014532303
TCG Midsouth, Inc.	0014532345
TCG Milwaukee, Inc.	0014532386
TCG Minnesota, Inc.	0014532410
TCG New Jersey, Inc.	0017516725
TCG of the Carolinas, Inc.	0014532428
TCG Ohio	0014532451
TCG Omaha	0014532469
TCG Oregon	0014535009
TCG Phoenix	0014532550
TCG Pittsburgh	0014532576
TCG Rhode Island	0014532592
TCG San Diego	0014532642
TCG San Francisco	0014533004
TCG Seattle	0014533053
TCG South Florida	0014533079
TCG St. Louis	0014533087
TCG Utah	0014533111
TCG Virginia, Inc.	0014533145
TeleCorp Communications, LLC	0011499910
Teleport Communications Atlanta, Inc.	0014533178
Teleport Communications Houston, Inc.	0014533277
Teleport Communications New York	0014533301
Teleport Communications Washington DC, Inc.	0014533368
Texas RSA 18 Limited Partnership	0001666072
Texas RSA 19 Limited Partnership	0001666056

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
Texas RSA 20B1 Limited Partnership	0001665058
Texas RSA 6 Limited Partnership	0001665991
Texas RSA 7B1 Limited Partnership	0001666007
Texas RSA 9B1 Limited Partnership	0001666023
Texas RSA No. 2 Limited Partnership	0004550547
The Ohio Bell Telephone Company	0002946986
The Southern New England Telephone Company	0003576931
T-Mobile Central LLC	0014510028
T-Mobile License LLC	0001565449
T-Mobile Puerto Rico LLC	0014848477
T-Mobile South LLC	0014510861
T-Mobile USA, Inc.	0004121760
T-Mobile West Corporation	0002837276
Topeka SMSA Limited Partnership	0001658632
Voicestream Pittsburgh, L.P.	0003408150
Wallc License, LLC	0018295543
Wisconsin Bell, Inc.	0002716561
XIT Newco LLC	0020076600

ATTACHMENT B
AT&T CY11 Annual CPNI Certifications

**Summaries of Customer Complaints and
Actions Taken Against Data Brokers**

Summary of Customer Complaints

As required by 47 C.F.R. §64.2009(e), following is a summary of customer complaints concerning the unauthorized release of Customer Proprietary Network Information (CPNI) received by AT&T Inc. from January 1, 2011 to December 31, 2011:

CPNI Complaint Category	Number of Customer Complaints 2011
Complaints of improper access to CPNI by an AT&T employee or an AT&T agent	676
Complaints of improper disclosure of CPNI to an unauthorized third party	52
Complaints of improper access to online CPNI by an unauthorized third party	76
Total	804

Summary of Actions Taken Against Data Brokers

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.